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RF Exposure evaluation

Report Reference No.: CTL2501218031-WFH

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Product Name: KOMMUTER

Model/Type reference: KOVE Kommuter

List Model(s): N/A

Trade Mark: KOVE

FCC ID: 2BKLO-KOVEKOMMUTER

Applicant's name: Birch Strategic Capital LLC

Address of applicant: 31207 Ceanothus Dr, Laguna Beach, CA 92651

Test Firm: Shenzhen CTL Testing Technology Co., Ltd.

Address of Test Firm: Floor 1-A, Baisha Technology Park, No.3011, Shahexi Road, Nanshan District, Shenzhen, China 518055

Test specification:

47CFR §1.1310

Standard:

47CFR §2.1093

KDB447498 D01 General RF Exposure Guidance v06

TRF Originator: Shenzhen CTL Testing Technology Co., Ltd.

Master TRF: Dated 2017-01

Date of receipt of test item: February 12, 2025

Date of Test: February 12, 2025 - February 24, 2025

Date of Issue: April 14, 2025

Result: Pass

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TEST REPORT

Test Report No. :	CTL2501218031-WFH	April 14, 2025
		Date of issue

Product Name : KOMMUTER

Sample No : CTL2501218031

Model /Type : KOVE Kommuter

Listed Models : N/A

Applicant : **Birch Strategic Capital LLC**

Address : 31207 Ceanothus Dr, Laguna Beach, CA 92651

Manufacturer : **Shenzhen Trendwoo Tech. Co., Ltd.**

Address : Units 3202&3208, 32nd floor, Block C, Phase 2 Galaxy World, Minle community, Minzhi street, Longhua district, Shenzhen, China

The test results presented in this report relate only to the object tested.

This report shall not be reproduced, except in full, without the written approval of the issuing testing laboratory.

**** Modified History ****

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1 GENERAL INFORMATION

1.1 Environmental conditions

During the measurement the environmental conditions were within the listed ranges:

Normal Temperature:	25°C -35°C
Relative Humidity:	35%-55 %
Air Pressure:	101 KPa

1.2 Product Description

Product Name:	KOMMUTER
Model/Type reference:	KOVE Kommuter
Power supply:	DC 5V---0.8A from adapter or DC 3.7V from battery
Bluetooth:	
Version:	Supported BR/EDR
Modulation:	GFSK, $\pi/4$ DQPSK, 8DPSK
Operation frequency:	2402MHz~2480MHz
Channel number:	79
Channel separation:	1MHz
Antenna type:	PCB Antenna
Antenna gain:	1.08dBi

Note 1: For more details, refer to the user's manual of the EUT.

Note 2: Antenna gain and cable loss provided by the applicant.

Note 3: This product is composed of two exactly identical components, so only one of them is tested.

1.3 Test Facility

1.3.1 Address of the test laboratory

Shenzhen CTL Testing Technology Co., Ltd.

Floor 1-A, Baisha Technology Park, No.3011, Shahexi Road, Nanshan District, Shenzhen, China 518055

There is one 3m semi-anechoic chamber and two line conducted labs for final test. The Test Sites meet the requirements in documents ANSI C63.4 and CISPR 32/EN 55032 requirements.

1.3.2 Laboratory accreditation

The test facility is recognized, certified, or accredited by the following organizations:

CNAS-Lab Code: L7497

Shenzhen CTL Testing Technology Co., Ltd. has been assessed and proved to be in compliance with CNAS-CL01 Accreditation Criteria for Testing and Calibration Laboratories (identical to ISO/IEC 17025: 2017 General Requirements) for the Competence of Testing and Calibration Laboratories.

A2LA-Lab Cert. No. 4343.01

Shenzhen CTL Testing Technology Co., Ltd, EMC Laboratory has been accredited by A2LA for technical competence in the field of electrical testing, and proved to be in compliance with ISO/IEC 17025: 2017 General Requirements for the Competence of Testing and Calibration Laboratories and any additional program requirements in the identified field of testing.

IC Registration No.: 9618B

CAB identifier: CN0041

The 3m alternate test site of Shenzhen CTL Testing Technology Co., Ltd. EMC Laboratory has been registered by Innovation, Science and Economic Development Canada to test to Canadian radio equipment requirements with Registration No.: 9618B.

FCC-Registration No.: 399832

Designation No.: CN1216

Shenzhen CTL Testing Technology Co., Ltd. EMC Laboratory has been registered and fully described in a report filed with the (FCC) Federal Communications Commission. The acceptance letter from the FCC is maintained in our files. Registration 399832.

1.4 Statement of the measurement uncertainty

The data and results referenced in this document are true and accurate. The reader is cautioned that there may be errors within the calibration limits of the equipment and facilities. The measurement uncertainty was calculated for all measurements listed in this test report acc. to CISPR 16-4 Specification for radio disturbance and immunity measuring apparatus and methods – Part 4: Uncertainty in EMC Measurements“ and is documented in the Shenzhen CTL Testing Technology Co., Ltd. quality system acc. to DIN EN ISO/IEC 17025. Furthermore, component and process variability of devices similar to that tested may result in additional deviation. The manufacturer has the sole responsibility of continued compliance of the device.

Hereafter the best measurement capability for CTL laboratory is reported:

Test Items	Measurement Uncertainty	Notes
Transmitter power conducted	± 1.18 dB	(1)

Note 1: This uncertainty represents an expanded uncertainty expressed at approximately the 95% confidence level using a coverage factor of $k=1.96$.

2 METHOD OF MEASUREMENT

2.1 Applicable Standard

[ANSI C95.1–1999](#): IEEE Standard for Safety Levels with Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz.

[FCC KDB447498 D01 General RF Exposure Guidance v06](#): Mobile and Portable Device, RF Exposure, Equipment Authorization Procedures.

[FCC CFR 47 part1 1.1310](#): Radiofrequency radiation exposure limits.

[FCC CFR 47 part2 2.1093](#): Radiofrequency radiation exposure evaluation: portable devices

2.2 Evaluation Method and Limit

According to KDB447498 D01 General RF Exposure Guidance v06 Section 4.3.1 Standalone SAR test exclusion considerations: “Unless specifically required by the published RF exposure KDB procedures, standalone 1-g head or body and 10-g extremity SAR evaluation for general population exposure conditions, by measurement or numerical simulation, is not required when the corresponding SAR Test Exclusion Threshold condition, listed below, is satisfied. These test exclusion conditions are based on source-based time-averaged maximum conducted output power of the RF channel requiring evaluation, adjusted for tune-up tolerance, and the minimum test separation distance required for the exposure conditions. The minimum test separation distance is determined by the smallest distance from the antenna and radiating structures or outer surface of the device, according to the host form factor, exposure conditions and platform requirements, to any part of the body or extremity of a user or bystander (see 5) of section 4.1). To qualify for SAR test exclusion, the test separation distances applied must be fully explained and justified by the operating configurations and exposure conditions of the transmitter and applicable host platform requirements, typically in the SAR measurement or SAR analysis report, according to the required published RF exposure KDB procedures. When no other RF exposure testing or reporting is required, a statement of justification and compliance must be included in the equipment approval, in lieu of the SAR report, to qualify for the SAR test exclusion. When required, the device specific conditions described in the other published RF exposure KDB procedures must be satisfied before applying these SAR test exclusion provisions; for example, handheld PTT two-way radios, handsets, laptops & tablets etc.”

$$[(\text{max. power of channel, including tune-up tolerance, mW}) / (\text{min. test separation distance, mm})] \cdot [\sqrt{f} \text{ (GHz)}] \leq 3.0 \text{ for 1-g SAR and } \leq 7.5 \text{ for 10-g extremity SAR, where:}$$

- f (GHz) is the RF channel transmit frequency in GHz
- Power and distance are rounded to the nearest mW and mm before calculation
- The result is rounded to one decimal place for comparison
- 3.0 and 7.5 are referred to as the numeric thresholds in the step 2 below

The test exclusions are applicable only when the minimum test separation distance is ≤ 50 mm and for transmission frequencies between 100 MHz and 6 GHz. When the minimum test separation distance is < 5 mm, a distance of 5 mm according to f in section 4.1 is applied to determine SAR test exclusion.

When one of the following test exclusion conditions is satisfied for all combinations of simultaneous transmission configurations, further equipment approval is not required to incorporate transmitter modules in host devices that operate in the mixed mobile and portable host platform exposure conditions. The grantee is responsible for documenting this according to Class I permissive change requirements. Antennas that qualify for standalone SAR test exclusion must apply the estimated standalone SAR to determine simultaneous transmission test exclusion.

The $[\sum \text{ of (the highest measured or estimated SAR for each standalone antenna configuration, adjusted for maximum tune-up tolerance) } / 1.6 \text{ W/kg}] + [\sum \text{ of MPE ratios}] \leq 1.0$.

The SAR to peak location separation ratios of all simultaneously transmitting antenna pairs operating in portable device exposure conditions are all ≤ 0.04 , and the $[\sum \text{ of MPE ratios}] \leq 1.0$.

3 Conducted Power Results

Bluetooth

Mode	Frequency (MHz)	Peak Conducted Output Power (dBm)
GFSK	2402	-1.52
	2441	-1.25
	2480	-2.07
Pi/4DQPSK	2402	-0.71
	2441	-0.70
	2480	-1.27
8DPSK	2402	-0.41
	2441	-0.14
	2480	-1.09

Bluetooth Low Energy

Mode	Frequency (MHz)	Peak Conducted Output Power (dBm)
1M	2402	-7.08
	2440	-6.99
	2480	-7.47
2M	2402	-6.96
	2440	-6.85
	2480	-7.32

4 Manufacturing Tolerance

Bluetooth

GFSK (Peak)			
Channel	Channel 0	Channel 39	Channel 78
Target (dBm)	-2.0	-2.0	-3.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0
$\pi/4$ DQPSK (Peak)			
Channel	Channel 0	Channel 39	Channel 78
Target (dBm)	-1.0	-1.0	-2.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0
8DPSK (Peak)			
Channel	Channel 0	Channel 39	Channel 78
Target (dBm)	-1.0	-1.0	-2.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0

Bluetooth Low Energy

BLE_1M: GFSK (Peak)			
Channel	Channel 0	Channel 19	Channel 39
Target (dBm)	-8.0	-7.0	-8.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0
BLE_2M: GFSK (Peak)			
Channel	Channel 0	Channel 19	Channel 39
Target (dBm)	-7.0	-7.0	-8.0
Tolerance $\pm$ (dB)	1.0	1.0	1.0

5 Evaluation Results

5.1 Standalone Evaluation

Mode	f (GHz)	Antenna Distance (mm)	RF output power		SAR Test Exclusion Threshold	SAR Test Exclusion
			dBm	mW		
GFSK	2.441	5	-1	0.79	$0.2482 < 3.0$	Yes
Pi/4DQPSK	2.441	5	0	1.00	$0.3125 < 3.0$	Yes
8DPSK	2.441	5	0	1.00	$0.3125 < 3.0$	Yes
BLE_1M	2.44	5	-6	0.25	$0.0785 < 3.0$	Yes
BLE_2M	2.44	5	-6	0.25	$0.0785 < 3.0$	Yes

Remark:

1. Output power including tune up tolerance;
2. When the minimum test separation distance is < 5 mm, a distance of 5 mm according to f) in section 4.1 of KDB447498 D01 General RF Exposure Guidance v06 is applied to determine SAR test exclusion.

6 Conclusion

The measurement results comply with the FCC Limit per 47 CFR 2.1093 for the uncontrolled RF Exposure and SAR Exclusion Threshold per KDB447498 D01 General RF Exposure Guidance v06, No SAR is required.

*****THE END*****